

WILLKIE FARR & GALLAGHER_{LLP}

300 North LaSalle
Chicago, IL 60654-3406
Tel: 312 728 9000
Fax: 312 728 9199

March 26, 2025

VIA CM/ECF

The Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Forrest v. Trustees of Columbia University in the City of New York, No. 24 Civ.
1034 (MMG) (SN) (S.D.N.Y.)

Dear Judge Netburn:

The undersigned write on behalf of Plaintiff Mackenzie Forrest in the above-captioned action in response to the letter motion, filed on March 25, 2025 by Defendant Trustees of Columbia University in the City of New York (“Columbia”), requesting a two week extension of the current stay that this Court issued on March 5, 2025. ECF 90.

As an initial matter, Plaintiff notes that Columbia did not request Plaintiff’s consent for the extension prior to filing the letter motion, nor did it address the issue of Plaintiff’s consent in the motion, as required by the Your Honor’s Individual Rules of Practice in Civil Cases. While we do not object to a brief two week extension, we respectfully request that all parties adhere to and follow Judge Netburn’s Individual Rules of Practice in Civil Cases moving forward.

Furthermore, in the event that Columbia seeks another extension of the stay in the future, Plaintiff respectfully requests that the Court schedule a phone conference before granting such a request, as much time has passed since the parties’ settlement conference.

Dated: March 26, 2025

Respectfully Submitted,

/s/ Debra Bogo-Ernst

Debra Bogo-Ernst
WILLKIE FARR & GALLAGHER
300 North LaSalle Drive
Chicago, IL 60654-3406
Tel. (312) 728-9062
Fax (312) 728-9199
dernst@willkie.com

Ziporah Reich
THE LAWFARE PROJECT LLP
633 Third Avenue, 21st Floor
New York, NY 10017
(212) 339-6995
Ziporah@TheLawfareProject.org

Counsel for Plaintiff Mackenzie Forrest

cc: All counsel of record (via ECF)